

1 L. Edward Humphrey—NV Bar 9066  
2 **HUMPHREY LAW PLLC**  
3 201 West Liberty Street, Suite 204  
4 Reno, Nevada 89501  
5 Tel: 775.420.3500  
6 Fax: 855.485.6329  
7 [ed@hlawnv.com](mailto:ed@hlawnv.com)  
8 *Attorney for Plaintiff,*  
9 *Pedro Rosales-Martinez*

7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9 PEDRO ROSALES-MARTINEZ

10 Plaintiff,

11 v.

12 COLBY PALMER, et. al.,

13 Defendants.  
14  
15

Case No.: 3:10-cv-00748-MMD-VPC

**STIPULATION AND ORDER  
EXTENDING TIME FOR  
PLAINTIFF TO FILE RESPONSE  
TO DEFENDANTS' RENEWED  
RULE 12 MOTIONS (ECF Nos. 136,  
137, and 138)**

16 IT IS HEREBY STIPULATED by and between Plaintiff Pedro Rosales-Martinez  
17 (“Plaintiff”), and Defendants Washoe County, Heidi Poe, City of Reno, Colby Palmer and  
18 Rick Ayala (collectively, “Defendants”), by and through their respective attorneys, that  
19 Plaintiff may have additional time within which to respond to Washoe County’s *Renewed*  
20 *Motion to Dismiss* [ECF No. 136], Defendant Heidi Poe’s (*Second*) *Renewed Motion for*  
21 *More Definite Statement* [ECF 137], and *Defendants City of Reno, Colby Palmer and Rick*  
22 *Ayala’s Renewed Motion to Dismiss* [ECF 138] each filed on December 21, 2017  
23 (collectively, the “Defendants’ Renewed Rule 12 Motions”). Pursuant to this Stipulation,  
24 Plaintiff shall have until February 4, 2018 in which to file a Response/Opposition to the  
25 Defendants’ Rule 12 Motions, and Defendants shall each have until February 22, 2018 to file  
26 any reply thereto.  
27  
28

1 Good cause exists for this extension as Plaintiff's counsel has just recently been  
2 engaged to represent the Plaintiff regarding the remaining elements of the case and requires  
3 time to become knowledgeable about the case and its procedural posture, and to prepare a  
4 response.  
5

6 This stipulation is not filed for any dilatory or improper purpose.

7 **HUMPHREY LAW PLLC**

**CHRISTOPHER J. HICKS**

**DISTRICT ATTORNEY**

9  
10 By: /s/ L. Edward Humphrey

L. Edward Humphrey, Esq. NSBN 9066

201 W. LIBERTY STREET, SUITE 204

RENO, NEVADA 89501

Tel: 775.420.3500

Fax: 855.485.6329

[ed@hlawnv.com](mailto:ed@hlawnv.com)

*Attorney for Plaintiff*

By: /s/ Herbert B. Kaplan

Herbert B. Kaplan, Esq.

Deputy District Attorney, NSBN 7395

P.O. BOX 11130

RENO, NV 89520-0027

Tel: 775-337-5700

*Attorneys for Washoe County*

15  
16 **ADAM PAUL LAXALT**

**Attorney General**

**KARL S. HALL**

**RENO CITY ATTORNEY**

18 By: /s/ Nathan L Hastings

Nathan L. Hastings, NSBN 11593

Senior Deputy Attorney General

555 Wright Way

Carson City, Nevada 89711

Tel: 775-684-4606

Fax: 775-684-4601

*Attorneys for Defendant Heidi Poe*

By: /s/ Mark W. Dunagan

Mark W. Dunagan, Esq.

Deputy City Attorney, NSBN 10574

Post Office Box 1900

Reno, Nevada 89505

Tel: 775-334-2050

*Attorneys for City of Reno*

24 **ORDER**

25 IT IS SO ORDERED:

26  
27 

28 UNITED STATES DISTRICT JUDGE

Dated January 4, 2018.